

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT

Case Type: Personal Injury

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Jamil Macklin Ford,

Plaintiff,

**SUMMONS**

v.

Federal Express Corporation,

Defendant.

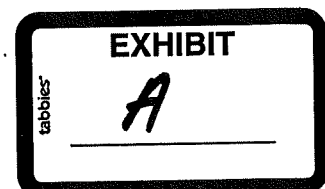
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THIS SUMMONS IS DIRECTED TO THE ABOVE-NAMED DEFENDANT:

1. **YOU ARE BEING SUED.** Plaintiff has started a lawsuit against you. Plaintiff's Complaint against you is attached to this Summons. Do not throw these papers away. These are official papers that affect your rights. You must respond to this lawsuit even though it may not yet have been filed with the Court and there may be no Court file number on this Summons.

2. **YOU MUST REPLY WITHIN 20 DAYS TO PROTECT YOUR RIGHTS.** You must give or mail to the person who signed this Summons a **written response**, called an Answer, within 20 days of the date on which you receive this Summons. You must send a copy of your Answer to:

Charles Zuluaga, Esq.  
Timothy J. Johnson, Esq.  
**Johnson Law Office, P.A.**  
8681 Eagle Point Boulevard  
Lake Elmo, Minnesota 55042  
Phone: (651) 797-0971  
Phone: (651) 731-8015  
Fax: (651) 731-8004



**3. YOU MUST RESPOND TO EACH CLAIM.** The Answer is your written response to Plaintiff's Complaint. In your Answer, you must state whether you agree or disagree with each paragraph of the Complaint. If you believe Plaintiff should not be given everything asked for in the Complaint, you must say so in your Answer.

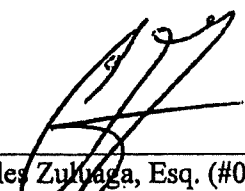
**4. YOU WILL LOSE YOUR CASE IF YOU DO NOT SEND A WRITTEN RESPONSE TO THE COMPLAINT TO THE PERSON WHO SIGNED THIS SUMMONS.** If you do not provide a written Answer in the matter described herein within 20 days, you will lose this case. You will not get to tell your side of the story, and the Court may decide against you and award Plaintiff everything asked for in the Complaint. If you do not want to contest the claims stated in the Complaint, you do not need to respond. A default judgment can then be entered against you for the relief requested in the Complaint.

**5. LEGAL ASSISTANCE.** You may wish to get legal help from a lawyer. If you do not have a lawyer, the Court Administrator may have information about places where you can get legal assistance. Even if you cannot get legal help, you must still provide a written Answer to protect your rights or you may lose the case.

**6. ALTERNATIVE DISPUTE RESOLUTION.** The parties may agree to or be ordered to participate in an alternative dispute resolution process under Rule 114 of the Minnesota General Rules of Practice. You must still send your written Answer to the Complaint even if you expect to use alternative means of resolving this dispute.

**Johnson Law Office, P.A.**

2/19/21  
Dated

  
\_\_\_\_\_  
Charles Zukaga, Esq. (#0397132)  
Timothy J. Johnson, Esq. (#0303781)  
**Johnson Law Office, P.A.**  
8681 Eagle Point Boulevard  
Lake Elmo, Minnesota 55042  
Phone: (651) 731-8015  
Fax: (651) 731-8004  
ATTORNEYS FOR PLAINTIFF

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF HENNEPIN

FOURTH JUDICIAL DISTRICT  
Case Type: Personal Injury

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Jamil Macklin Ford,

Plaintiff,

**COMPLAINT**

v.

Federal Express Corporation,

Defendant.

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Jamil Macklin Ford ("Plaintiff") for his cause of action against Federal Express Corporation, ("Defendant"),

states and alleges as follows:

**PARTIES AND VENUE**

1. Plaintiff resides in Minneapolis, in Hennepin County, Minnesota.
2. On information and belief, Defendant is a Minnesota corporation, with a principal office located in St Paul, in Ramsey County, Minnesota.
3. This action arises out of a motor vehicle accident that occurred on December 5, 2018 ("Accident"), on Penn Avenue South near American Boulevard West in Bloomington, Hennepin County, Minnesota. Thus, Hennepin County is the proper venue for this case.

**FACTS**

4. At the time of the Accident, Plaintiff was Southbound on Penn Avenue near American Boulevard West in Bloomington, when another vehicle, Defendant, traveling Eastbound, failed to stop at a red stop light causing an accident.

### **CLAIM**

Plaintiff states and alleges all facts and allegations set forth in paragraphs 1 through 4, as though fully included herein, and further alleges as follows:

5. The Accident resulted from Defendant's negligence in operating their motor vehicle by failing to stop at the red light.

6. As a direct and proximate result of the negligence of Defendant, Plaintiff sustained serious injuries, including but not limited to headaches, neck injury, shoulder injury, back injury, disc protrusions at C5-6 and C6-7. Plaintiff underwent both a subacromial injection and a cervical medical branch radiofrequency ablation. Plaintiff has in the past suffered, and will in the future suffer, from pain, discomfort and emotional distress as a result of his injuries. Plaintiff has in the past incurred, and will in the future incur, medical expenses to treat his injuries. Plaintiff has in the past incurred lost wages, and will need future medications, chiropractic, physical therapy, injections, and radiofrequency ablations, as a result of his accident-related injuries.

### **REQUEST FOR RELIEF**

Plaintiff requests that the Court:

1. Enter judgment in favor of Plaintiff, and against Defendant, in an amount in excess of Fifty Thousand and 00/100 Dollars (\$50,000.00), together with prejudgment interest, post judgment interest and the costs and disbursements incurred in prosecuting this matter; and
2. Grant such other and further relief as this Court deems just and equitable.

2/19/21

Dated

**Johnson Law Office, P.A.**

Charles Zuluaga, Esq. (#0397132)

Timothy J. Johnson, Esq. (#0303781)

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8681 Eagle Point Boulevard

Lake Elmo, Minnesota 55042

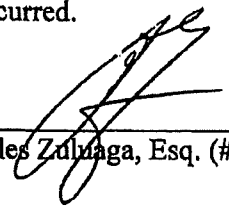
(651) 731-8016

ATTORNEYS FOR PLAINTIFF

**ACKNOWLEDGMENT**

Plaintiff, by his attorney, hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded to the opposing party under the provisions of Minnesota Statutes Section 549.211, subd. 2, if the Court determines a violation of the prohibitions imposed by Section 549.211, subd. 2, has occurred.

2/19/21

  
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Charles Zuluaga, Esq. (#0397132)